

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA**

**v.**

**PATRICK KEOGAN,**

**Defendant.**

**Criminal Case No. 16-CR-10244-DPW**

**JOINT INITIAL STATUS REPORT**

Pursuant to Local Rule 116.5, the parties have conferred and submit this joint initial status report:

1. The United States has provided automatic discovery within the time provided by the local rules. Mr. Keogan has not made any additional discovery requests, but may do so after reviewing the automatic discovery.
2. If Mr. Keogan so requests, the United States will work with his counsel to provide discovery in addition to that required by the local rules in the next 45 days.
3. Mr. Keogan requires the next 45 days to review the discovery to evaluate whether and when to require additional discovery. The parties do not anticipate any discovery disputes.
4. The parties do not anticipate requiring a protective order, but will work together to submit a joint order if either party identifies a need to do so.
5. Mr. Keogan requires the next 45 days to review the discovery before his counsel can identify whether any pretrial motions will be necessary and on what schedule they could be filed.

6. The United States will produce any expert witness reports 45 days before trial.  
The defense will produce expert witness reports 30 days before trial.

7. Mr. Keogan does not intend to assert the defenses of insanity, public authority, or alibi.

8. The parties believe that the Court has excluded all of the time from indictment on August 18, 2016, through the initial status conference to be held on October 6, 2016, and ask the Court to exclude the next period from October 6, 2016 through the date of the next interim status conference.

9. Counsel have had informal discussions about whether this case could be resolved with a plea or would need to be tried, all of which defense counsel has relayed to Mr. Keogan. There has been no formal plea offer. At this point, it is premature to predict whether a trial is likely. If a trial is necessary, it would likely last no more than two weeks, depending on the matters to which the parties could stipulate and whether the United States supersedes with additional charges.

10. The parties request that an interim status conference be scheduled 45 days after the initial status conference.

Respectfully submitted,

Carmen M. Ortiz  
United States Attorney

Jane Peachy, Esq.  
Assistant Federal Public Defender

By: /s/ Scott L. Garland  
Scott L. Garland  
Assistant U.S. Attorney

/s/ Jane Peachy  
Jane Peachy, Esq.  
Counsel for Defendant Keogan

**CERTIFICATE OF SERVICE**

I hereby certify that this document will be filed through the ECF system and therefore will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Scott L. Garland  
Scott L. Garland  
Assistant United States Attorney

Date: September 30, 2016